

Exhibit 1

3521-2

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 IN RE: JUUL LABS, :
4 INC., MARKETING, SALES : Case No.
PRACTICES, AND PRODUCT : 3:19-md-2913-WHO
LIABILITY LITIGATION :

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8 -HIGHLY CONFIDENTIAL-

9 SUBJECT TO PROTECTIVE ORDER

10 HYBRID VIDEOTAPED / REALTIMED DEPOSITION

11 MINETTE E. DRUMWRIGHT, Ph.D.

12 JUNE 1, 2022

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23 Reported By:

24 Pat English-Arredondo, CSR, RMR, CRR, CLR

25 JOB NO: 211783

1 A. So coercive power is generally
2 based on formal control, formal power, having
3 authority, like a 51 percent equity in a
4 company.

5 Q. Okay. And you would agree that
6 Altria did not have coercive power over the
7 business of JLI. Correct?

8 A. I would agree.

9 Q. Now, you said you are looking
10 at -- I just want to get this right --
11 directing, managing, or operating and -- I'm
12 going to add another word that you use in
13 your report -- influencing.

14 A. Yes.

15 Q. Okay. How do you distinguish
16 between those things, directing, managing,
17 operating, and influencing?

18 A. So influencing is necessary but
19 not sufficient to direct, manage, operate.
20 Influencing, you know, lays the foundation
21 for those things.

22 When you think about managing,
23 we're thinking about figuring out what the
24 right things are and then how to do the right
25 things right.

1 and operation, but if I'm not asking
2 about that, I don't need you to -- to
3 add it on. I just want the answer to
4 my questions, if that's okay.

5 MR. HUDSON: Okay. And all
6 I'll say on the record is that I think
7 today she has been very responsive to
8 the questions that have been asked.
9 If there's one category where you're
10 unhappy about that it's fine to have
11 mentioned that, but I don't think it
12 needs to rise to the point of
13 escalating the situation. We
14 understand and she'll do her very best
15 to answer your questions.

16 Q. (By Mr. Stekloff) Okay. But
17 my question is just simple. Yes or no. Did
18 Altria -- I'm -- I'm conceding the -- the
19 point. Simple question, did Altria have the
20 legal ability to force JLI to take any of its
21 services?

22 A. It did not have the legal
23 ability.

24 Q. Okay. Thank you. Is it also
25 true that JLI chose not to take many of the